

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

-----X  
In re: :  
 : Chapter 13  
MOUSES LAMAH :  
 : Case No. 24-13666 (AMC)  
Debtor. :  
-----X

**THE CITY OF PHILADELPHIA’S  
OBJECTION TO THE PROPOSED CHAPTER 13 PLAN**

TO THE HONORABLE ASHELY M. CHAN:

AND NOW, comes the City of Philadelphia, (the “City”), a creditor in the above-captioned case, by and through its Counsel, Megan N. Harper, Divisional Deputy City Solicitor, pursuant to Bankruptcy Code §§ 1308(a), 1322(a)(2), and L.B.R. 3015-4, to object to the proposed Chapter 13 Plan (the “Plan”), of the above-captioned debtor, (the “Debtor”). The City avers the following in support thereof:

1. On October 14, 2024, the Debtor filed a voluntary petition (the “Petition”) for Chapter 13 bankruptcy with this Court.
2. On April 4, 2025, the City filed a claim that included unliquidated, non-filed business tax returns for Business Income and Receipts Tax and Net Profit Tax for which the Debtor was obligated to file returns but has failed to do so. A true and correct copy of the claim is attached hereto as **Exhibit A**.
3. A portion of the unliquidated claim would be a priority claim pursuant to Section 507(a)(8) of the Bankruptcy Code.
4. As neither the Debtor nor another party in interest has objected to the Claim, it is deemed allowed. See 11 U.S.C. § 502(a).

5. As of April 21, 2025, the Debtor failed to file the following required tax returns with the City of Philadelphia:

**Business Income and Receipts Tax** return for the periods: 12/31/2017, 12/31/2018 12/31/2020, 12/31/2021 & 12/31/2024

**Net Profits Tax** return for the periods: 12/31/2017, 12/31/2018 12/31/2020, 12/31/2021 & 12/31/2024

6. The Plan should not be confirmed as the Debtor has failed to file all tax returns for all taxable periods during the four (4) year period ending on the date the petition was filed. See 11 U.S.C. § 1308(a).

7. A proposed plan must “provide for the full payment . . . of all claims entitled to priority” unless the claim holder agrees otherwise. See 11 U.S.C. § 1322(a)(2).

8. The Plan should not be confirmed until all returns are filed and all the taxes that constitute priority tax claims under 11 U.S.C. § 507 are provided for in the plan. See 11 U.S.C. § 1322(a)(2).

WHEREFORE, the City respectfully requests that this Court DENY confirmation of the Plan.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: April 21, 2025

By: /s/ Megan N. Harper  
MEGAN N. HARPER  
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PA Attorney I.D. 81669  
Attorney for the City of Philadelphia  
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**CERTIFICATE OF SERVICE**

I, Megan N. Harper, Divisional Deputy City Solicitor hereby certify that on April 21, 2025, a copy of the Objection to the Purposed Chapter 13 Plan was served on the following parties by Court-generated ECF notice, and/or first-class mail, postage prepaid, as indicated below:

Via ECF Filing:

MICHAEL A. CIBIK  
Cibik Law, P.C.  
1500 Walnut Street – Suite 900  
Philadelphia, PA 19102

Chapter 13 Trustee:

SCOTT F. WATERMAN  
Office of the Chapter 13 Standing Trustee  
2901 St. Lawrence Ave. – Suite 100  
Reading, PA 19606

United States Trustee  
Office of United States Trustee  
Robert N.C. Nix Federal Building  
900 Market Street – Suite 320  
Philadelphia, PA 19106

Via USPS Mail Delivery:

Mouses Lamah  
403 Durfor Street  
Philadelphia, PA 19148-3909

THE CITY OF PHILADELPHIA

Dated: April 21, 2025

By: /s/ Megan N. Harper  
MEGAN N. HARPER  
Divisional Deputy City Solicitor  
PA Attorney I.D. 81669